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Metropolitan Police Department, Sheriff

Joseph Lombardo, Sergeant Mark Cirkosz,

Officer Jake Freeman, Officer Blake Vernon,

and Officer Gerardo Reyes

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

BRANDON SUMMERS,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, in its official capacity;  
CLARK COUNTY, a political subdivision of  
the State of Nevada; SHERIFF JOSEPH  
LOMBARDO, an individual; SERGEANT  
MARK CIRKOSZ, an individual; OFFICER  
JAKE FREEMAN, an individual; OFFICER  
BLAKE VERNON, an individual; and  
OFFICER GERARDO REYES, an  
individual,

Defendants.

Case Number:

2:20-cv-01815-APG-EJY

**JOINT STATUS REPORT**

Plaintiff BRANDON SUMMERS (“Plaintiff”), Defendants LAS VEGAS  
METROPOLITAN POLICE DEPARTMENT, SHERIFF JOSEPH LOMBARDO,  
SERGEANT MARK CIRKOSZ, OFFICER JAKE FREEMAN, OFFICER BLAKE  
VERNON, and OFFICER GERARDO REYES (collectively “LVMPD Defendants”), and  
Defendant CLARK COUNTY, by their respective counsel, hereby stipulate to the following:

1. During the Fed. R. Civ. P. 26(f) conference conducted on December 9, 2020,  
the Parties determined that this matter was appropriate for possible early resolution and that  
a stay of discovery and other deadlines would allow the Parties to explore the possibility of

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1 settlement, without incurring the time and expense of ongoing discovery and other work  
2 during settlement discussions.

3 2. As such, the Parties entered into a stay of discovery and other deadlines so  
4 that the Parties could discuss settlement. ECF No. 16.

5 3. Plaintiff and LVMPD Defendants have participated in informal settlement  
6 discussions.

7 4. On July 23, 2021, Plaintiff sent LVMPD Defendants a formal demand.

8 5. On October 24, 2021, LVMPD Defendants responded to Plaintiff's demand  
9 and made an informal offer, subject to the approval of the Sheriff.

10 6. Plaintiff and LVMPD Defendants have made substantial progress in  
11 discussions but require additional time to agree to terms.

12 7. Plaintiff and the County have also had a discussion and anticipate having  
13 further discussions.

14 8. Accordingly, the Parties hereby agree and request the Court to enter a stay of  
15 all deadlines in the instant case until December 17, 2021.

16 9. Notwithstanding the stay, the Parties intend to and hereby agree to cooperate  
17 in the exchange of information as needed to facilitate settlement.

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10. The Parties further agree that, should they not be able to reach a settlement through informal discussion, they will provide an updated discovery plan and scheduling order to the Court within 14 days from the stay expiring.

Dated this 8th day of November, 2021

Dated this 8th day of November, 2021

MCLETCHIE LAW

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Reyes

Dated this 8th day of November, 2021

CLARK COUNTY DISTRICT  
ATTORNEY'S OFFICE

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**ORDER**

IT IS SO ORDERED this 9th day of November, 2021.

  
United States Magistrate Judge